

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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TRUSTEES OF THE LAUNDRY, DRY CLEANING  
WORKERS AND ALLIED INDUSTRIES HEALTH  
FUND, UNITE HERE!; and TRUSTEES OF THE  
LAUNDRY, DRY CLEANING WORKERS AND  
ALLIED INDUSTRIES RETIREMENT FUND,  
UNITE HERE!

07-CV-6999 (DLC)

Plaintiffs,

- against -

DECLARATION OF  
JEFFREY WARBET

B&M LINEN CORP. D/B/A MIRON & SONS  
LINEN SUPPLY A/K/A MIRON & SONS LINEN,  
INC.,

Defendant.

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JEFFERY WARBET, hereby declares, under penalty of perjury:

1. I am the Senior Vice President of ALICARE, an affiliate of the Amalgamated Life Insurance Company. I have held this position since November 2007. My prior position and title was Senior Vice President of Plan Participation for the Amalgamated Life Insurance Company. I held this position since at least 1998. In this position I oversaw the collections of delinquent contributions to employee welfare and benefit funds.

2. A true and correct copy of the Agreement and Declaration of Trust of Amalgamated Service and Allied Industries Insurance Fund is annexed hereto as Exhibit D.

3. A true and correct copy of the Agreement and Declaration of Trust of Amalgamated Service and Allied Industries Retirement Fund is annexed hereto as Exhibit E.

4. A true and correct copy of a letter from Miron Markus to me dated October 24, 2004 with an attached Generic (sic) Payroll Employee Contact List is annexed hereto as Exhibit

Q.

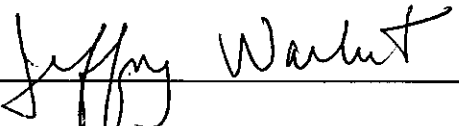
5. A true and correct copy of a Revised Audit Amount for Miron & Sons, Inc. for the period March 21, 2003 through March 10, 2004 for a total of \$79,049.96 is annexed hereto as Exhibit S.

6. The Revised Audit Amount calculated the contributions due for the period from March 20, 2003 through March 19, 2004 by subtracting \$120,218.34, the amount covered under the March 20, 2003 Settlement Agreement from the amount due for the audit period from January 1, 2001 through March 19, 2004.

7. The total amount of contributions due to the Funds from the Employer for the audit period from March 20, 2003 through March 19, 2004 is \$79, 049.96.

The foregoing statements made by me are true. I understand that if any are willfully false, I am subject to punishment.

Dated: New York, New York  
March 20, 2008

  
Jeffrey Warbet